

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

CIVIL ACTION No. 3:11-CV-30223

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DEBRA BAGGETT AND APRIL MARLBOROUGH,  
ON BEHALF OF THEMSELVES AND OTHER SIMILARLY SITUATED  
PLAINTIFFS

V.

MICHAEL J. ASHE, JR. AND PATRICIA MURPHY,  
IN THEIR INDIVIDUAL CAPACITIES  
DEFENDANTS

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***LEAVE TO FILE GRANTED ON APRIL 28, 2014***

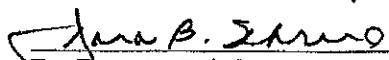
**AFFIDAVIT OF DR. DORA SCHRIRO**

1. My name is Dora Schriro. Since February 1, 2014, I have served as the Commissioner of the Connecticut Department of Emergency Services and Public Protection.
2. Between 2009 and January 31, 2014, I served as the Commissioner of the New York City Department of Correction.
3. I have been retained by the Defendants' counsel to serve as the Defendants' expert witness in the above-captioned matter.
4. On January 22, 2014, I submitted my expert report and opinion in this case, entitled Expert Disclosure of Dr. Dora B. Schriro (the "report"). The Expert Disclosure included a my full curriculum vitae, a summary of my qualifications, and other information required under the rules.
5. The Expert Disclosure is based on my review of the factual record in this case and on my professional experience and expertise. I express all of the opinions in the Expert Disclosure as an expert in the field and to reasonable degree of professional certainty.

Under penalty of perjury, I declare that the entire Expert Disclosure is true and accurate to the best of my knowledge.

6. If called at trial, I would testify consistent with the contents of the Expert Disclosure.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
Dr. Dora B. Schriro  
April 17, 2014